



NEW YORK  
REGIONAL OFFICE

UNITED STATES  
**SECURITIES AND EXCHANGE COMMISSION**  
BROOKFIELD PLACE, 200 VESEY STREET, SUITE 400  
NEW YORK, NY 10281-1022

June 16, 2021

**Via ECF**

Hon. Denise L. Cote  
United States District Judge  
United States District Court for the  
Southern District of New York  
500 Pearl Street, Room 1910  
New York, NY 10007

**Re: SEC v. Charles Samel, 20 Civ. 10769 (DLC) (S.D.N.Y.)**

Dear Judge Cote:

Plaintiff Securities and Exchange Commission (the “Commission”) and Defendant Charles Samel respectfully submit this joint status report, pursuant to the Court’s Order of June 4, 2021. The parties have reached a settlement in principle of this matter, which remains subject to Commission approval. We anticipate that the Commission will complete its review of the settlement in principle within approximately six to eight weeks. If the Commission approves the settlement, the parties intend to submit to the Court a proposed final consent judgment.

In light of the settlement in principle, the parties respectfully request that the Court stay all discovery and adjourn all deadlines in this matter until August 31, 2021, but keep this case open on its docket until the Commission completes its review of the settlement. No prior request for this relief has been made, and all parties consent to this stay of discovery and adjournment.

Respectfully submitted,

/s/ Philip A. Fortino

Philip A. Fortino  
Senior Counsel

cc: All counsel of record by ECF